

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**

KASEY D. ALVES

PLAINTIFF

VERSUS

CAUSE NO.:1:06cv912 LG-JMR

**HARRISON COUNTY MISSISSIPPI, BY AND  
THROUGH THE BOARD OF SUPERVISORS;  
HARRISON COUNTY SHERIFF'S DEPARTMENT;  
SHERIFF GEORGE PAYNE, JR.; and  
HEALTH ASSURANCE, LLC**

**DEFENDANTS**

**AFFIDAVIT**

PERSONALLY CAME AND APPEARED BEFORE ME the undersigned authority in and for the jurisdiction aforesaid, the within named Ronald G. Lynch, who, after being first duly sworn stated on oath the following:

1. When I was employed with the Miami Dade Police Department I was assigned as the evening shift commander of the Jail. The Jail is a ten story building housing between 800 and 1100 prisoners. As Commander, I was responsible for the actions of jail personnel including officers and supervisors.
2. My responsibilities included security for the facility and the safety of the inmates, staff (sworn and civilian), visitors, attorneys, media and relatives of the inmates.
3. In this capacity I was involved in the operation of the Jail from the time an inmate was admitted to the Jail, their processing in the booking department, housing and personal safety.
4. I was responsible for the investigation of all complaints of inmates, especially where excessive force was alleged.



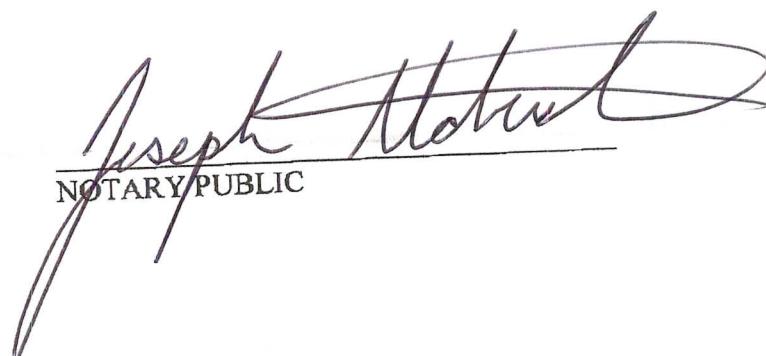
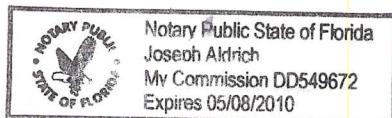
5. The allegations of excessive force that I investigated were similar in nature to those set forth in this litigation.

6. The standards for use of force by a deputy sheriff is the same regardless of whether or not the deputy sheriff is assigned to road patrol, investigations, the jail or any other provision. Excessive force has been clearly defined in reported cases and standards for law enforcement. I know these standards and have applied them in numerous positions in which I have been involved including the commander at the Miami Dade Police Department Jail.

WITNESS MY SIGNATURE this the 12 day of November, 2008.

  
RONALD G. LYNCH

SWORN TO AND SUBSCRIBED BEFORE ME this the 12 day of  
November, 2008.

  
NOTARY PUBLIC

My Commission Expires: 5/18/2010